

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

Case No.: 18-cv-2977-DLC

V.

**LONGFIN CORP.,
VENKATA S. MEENAVALLI,
ANDY ALTAHAWI,
SURESH TAMMINEEDI, and
DORABABU PENUMARTHI**

Defendants.

THE DISTRIBUTION AGENT'S FOURTH PROGRESS REPORT

Epiq Class Action & Claims Solutions Inc. (“Epiq”), the Court-appointed Distribution Agent in the above-captioned matter, respectfully submits this Fourth Progress Report pursuant to the Distribution Plan (the “Plan”) approved by the Court on June 30, 2020. This Court’s April 15, 2020 Order authorized the establishment of a Fair Fund and appointed Epiq as the Distribution Agent to oversee the administration and distribution of the Fair Fund. Pursuant to Section 5 (i) of the Order, the Distribution Agent is required to file quarterly progress reports within twenty (20) days after the end of every quarter. This report covers the period from July 1, 2021, through September 30, 2021.

**Tasks Performed by the Distribution Agent
Since the Third Progress Report**

Since the Third Progress Report, Epiq performed the following tasks pursuant to the Plan:

- Reviewed and processed Claims in accordance with the Plan. Through September 30, 2021, Epiq has received 2,604 Claims, which have all been scanned into Epiq's proprietary system.
- Generated and mailed Deficient or Ineligible Determination Notices to Claimants who filed a Proof of Claim Form determined deficient and/or ineligible.
- Engaged and provided requested information to EisnerAmper in connection with the Independent Third Party Review (the "Review"), including the claims data and documents requested by EisnerAmper. Epiq has responded, and continues to respond, to inquiries from EisnerAmper regarding the claims and/or requesting further information.
- Monitored the toll-free number and assisted Claimants with their inquiries. Through September 30, 2021, Epiq received 1,066 phone calls.
- Continually monitored the email inbox dedicated for this action and promptly responded to all potential Claimant inquiries that have been received by email; and
- Continued to host, monitor, and update the dedicated case website, www.LongfinFairFund.com. Through September 30, 2021, there have been a total of 3,787 unique visitors to the website.

Anticipated Next Steps

Following this Fourth Progress Report, Epiq will continue to implement the Plan, including:

- Reviewing deficiency responses to Determination Notices for Claims that are denied in whole or in part.
- Generating and mailing Final Determination Notices to Potential Claimants who timely responded to Determination Notices in an effort to cure a deficiency or seek reconsideration of a denied claim.

- Continuing to work with EisnerAmper to facilitate the Review and responding to inquiries.
- Establishing an escrow account and separate deposit account pursuant to an escrow agreement to be provided by SEC staff, in the name of and bearing the Employer Identification Number of the Qualified Settlement Fund.
- Compiling a list of all Eligible Claimants, including the names, addresses, and Distribution Payments (“Payee List”) and sending to the SEC staff along with a “Reasonable Assurances Letter” representing that the Payee List: (a) was compiled in accordance with the Plan; 9b) is accurate as to Eligible Claimants’ names, address, and Eligible Loss Amount; and (c) provides all information necessary to make a payment equal to the amount of the applicable Distribution Payment for such Eligible Claimant.
- Depending on the timing of the completion of the foregoing and the receipt of funds from the SEC, beginning the distribution of funds to Eligible Claimants
- Filing its next Progress Report within twenty (20) days after the end of the next quarter, pursuant to section 5 (i) of the Court’s April 15, 2020 Order.

Dated: October 19, 2021

Respectfully submitted,

By: Stephanie Amin-Giwner
Stephanie Amin-Giwner
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